



City of Cambridge

Executive Department

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Cannabis Control Commission
101 Federal Street, 13th Floor
Boston, MA 02110

Re: DRAFT REGULATIONS

City of Cambridge Comments on Draft Regulations on Adult Use of Marijuana

Dear Commission Members,

I hereby submit the comments and questions of the City of Cambridge on the Draft 935 CMR 500.000 “Adult Use of Marijuana” regulations approved by the Cannabis Control Commission on December 21, 2017.

The City of Cambridge believes that it would be helpful if the regulations could be clarified as they relate to the following questions:

Marijuana Establishment Types

- Can local communities prohibit, through zoning or other municipal ordinances, the cultivation or manufacturing of marijuana products, if marijuana retailers are allowed?
- Can local communities place prohibitions, limits, or controls on Marijuana Social Consumption Establishments through zoning or other municipal ordinances? Are there limitations on local controls, as there are for other marijuana retailers?
- Will Medical Marijuana Dispensaries have requirements for Host Community Agreements, as with other marijuana establishments?
- Will there be any local review process for Marijuana Transporter licenses?

Marijuana Establishment Locations

- The buffer standards in Section 500.101(A)(1)(h)(i) differ from those in Section 500.110(C). Does the buffer apply only to public and private schools, or also to daycare centers and other facilities “in which children commonly congregate”?
- Can local communities establish required distances from other types of land uses or districts through zoning?



Marijuana Establishment Operations

- Are there measures to control the processing, packaging, or repackaging of marijuana products within a retail marijuana establishment? Can local regulations control or prevent this type of activity?
- The draft regulations specify no smoking in Marijuana Social Consumption Establishments before October, 2018. What requirements will apply after that time? Do prohibitions on smoking also apply to vaporizing?
- Will there be statewide standards for the suitability of scales used in marijuana packaging, and for the packaging/labeling of marijuana product quantities? Will these be subject to local oversight?
- What checks will be in place for products that are packaged in one community then transported and sold in another community?

Health Information to Consumers

- Will marijuana establishments be required to provide information on dosing, controlling access to edibles, and other public health and safety issues?
- Can local agencies require marijuana establishments to provide public health information in addition to the information required by the CCC?

Enforcement

- How will compliance with restrictions on sales to people under 21 be enforced? Will state or local regulators be responsible for compliance checks? How will they be funded?
- Will prohibitions on smoking in marijuana establishments be enforced in the same manner as prohibitions on smoking in workplaces? Will state or local agencies be responsible for oversight?
- How are Host Community Agreements meant to be enforced? Will violations be reported to and enforced by the Cannabis Control Commission?
- Are the representations made by potential licensees at required community hearings meant to be binding? If a licensee does not fulfill commitments made at a community hearing, could the Cannabis Control Commission take enforcement action?

Thank you for your consideration of these issues.

Respectfully Submitted,



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